

FILED

MAY 07 2007

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE**RECEIVED**

APR 27 2007

1 STEPHEN C. JOHNSON (State Bar No. 145210)
 2 HEATHER M. NOELTE (State Bar No. 180243)
 3 DEMPSEY & JOHNSON P.C.
 1880 Century Park East, Suite 516
 4 Los Angeles, California 90067-1605
 Telephone: (310) 551-2300
 5 Facsimile: (310) 551-2301
 scjohnson@dempseyjohnson.com
 hnoelte@dempseyjohnson.com

6 Attorneys for Plaintiff NEW AMSTERDAM
 7 PROJECT MANAGEMENT HUMANITARIAN
 FOUNDATION

8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10
 11 NEW AMSTERDAM PROJECT
 12 MANAGEMENT HUMANITARIAN
 13 FOUNDATION, a Dutch non-profit
 corporation

14 Plaintiff,

15 v.

16 KELLY M. LAUGHRIN, CAMPBELL,
 17 WARBUTON, FITZSIMMONS,
 SMITH, MENDELL & PASTORE a
 18 California corporation; and
 DOES 1 through 25,

19 Defendants.

CASE NO.: C07-00935 HRL

**STIPULATION AND PROPOSED
 ORDER CONTINUING THE CASE
 MANAGEMENT CONFERENCE
 AND RELATED DEADLINES**

21
 22 Plaintiff New Amsterdam Project Management Humanitarian Foundation
 23 ("NAF") and Defendants Kelly Laughrin and Campbell Warbuton, Fitzsimmons,
 24 Smith Mendell & Pastore ("Defendants"), by and through their respective attorneys of
 25 record, hereby stipulate and agree with reference to the following facts:

26 The complaint was filed on February 14, 2007;

27 On February 16, 2007, Plaintiff sent Notices of Lawsuit and Request for Waiver
 28 of Service of Summons to Defendants;

On March 19, 2007, Campbell Warbuton, Fitzsimmons, Smith Mendell &

DEMPSEY & JOHNSON P.C.

Pastore executed the Notice of Lawsuit and Request for Waiver of Service of Summons;

On March 15, 2007 Kelly M. Laughrin executed the Notice of Lawsuit and Request for Waiver of Service of Summons;

On April 13, 2007, counsel for Defendants requested, and NAF consented to, a two week extension of time to respond to the complaint;

And on April 17, 2007, this Court issued an order granted the Defendants' request for an extension of time as an unopposed motion under Civil L. R. 6-3, giving Defendants up to and including May 1, 2007 to respond to the complaint;

A case management conference has been scheduled in the matter for May 22, 2007 with corresponding deadlines of May 1, 2007 to meet and confer under Fed. R. Civ. Pro. 26 and May 15, 2007 to exchange initial disclosures.

Given that the case is not at issue and Defendants' responsive pleading is not due until the deadline for meeting and conferring under Rule 26,

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that the Case Management Conference currently set for May 22, 2007 in Courtroom 2 at 1:30 p.m. be continued to July 17, 2007, with corresponding deadlines of June 28, 2007 to meet and confer under Fed. R. Civ. Pro. 26 and July 10, 2007 to exchange initial disclosures.

DATED: April 27, 2007

DEMPSEY & JOHNSON P.C.

By: 

HEATHER M. NOELTE

Attorneys for Plaintiff

NEW AMSTERDAM PROJECT
MANAGEMENT HUMNAITARIAN
PROJECT

04-27-07 01:06pm From-DEMPSEY & JOHNSON PC

19105312301

T-355 P.03/04 F-495

1
2 DATED: April 27, 2007

ROPER, MAJESKI, KOHN & BENTLEY

3
4 By:  (R)

RICHARD M. WILLIAMS

Attorneys for Defendants,

6 KELLY M. LAUGHRIN, CAMPBELL

7 WARBURTON, FITZSIMMONS, SMITH,

8 MENDELL & PASTORE

9
10
11 [PROPOSED] ORDER

12 Good cause appearing therefore:

13 IT IS HEREBY ORDERED that the Case Management Conference currently
14 set for May ²⁵~~22~~, 2007 in ~~Courtroom 2~~ at ~~1:30 p.m.~~ is hereby continued to ~~July 17,~~
15 ~~2007~~, with corresponding deadlines of June 28, 2007 to meet and confer under Fed. R.
16 Civ. Pro. 26 and July 10, 2007 to exchange initial disclosures.

17 CMC Continued to July 20, 2007 at 10:30 a.m. in Courtroom 3.

18
19 DATED: By: 20 HON. HOWARD R. LLOYD *Jeremy Fogel*

21 MAGISTRATE JUDGE District Judge

22 UNITED STATES DISTRICT COURT
23
24
25
26
27
28

DEMPSEY & JOHNSON P.C.

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and am not a party to the within action. I am employed by the law firm of Dempsey & Johnson, located at 1880 Century Park East, Suite 416, Los Angeles, California 90067,

On April 27, 2007, I served the foregoing document(s) described as **STIPULATION AND PROPOSED ORDER CONTINUING THE CASE MANAGEMENT CONFERENCE AND RELATED DEADLINES** by enclosing the document(s) in a sealed envelope addressed as follows:

Richard M. Williams, Esq.
Robers, Majeski, Kohn & Bentley
80 North First Street
San Jose, CA 95113

☒ **BY MAIL:** I am readily familiar with the business's practice of collection and processing of documents for mailing with the United States Postal Service and that the documents are deposited in the United States Postal Service the same day as the day of collection in the ordinary course of business. The sealed envelope with postage thereon fully prepaid was placed for collection and mailing on the above date following ordinary business practices.

☐ **(State)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ **(Federal)** I declare that I am employed in the office of a member of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on April 27, 2007, at Los Angeles, California.

Myrna Yzaguirre
Type or Print Name


Signature